

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

Dr. Leslie Hannah,)	
)	
Plaintiff,)	
)	
v.)	Case No. 14-CIV-074-RAW
)	
Northeastern State University, et al.,)	
)	
Defendants.)	

**DEFENDANT'S INITIAL DISCLOSURES TO
PLAINTIFF LESLIE HANNAH**

To: Plaintiff, Leslie Hannah through his attorneys,

Defendants, Initial Disclosures to Plaintiff pursuant to Rule 26 (a)(1)(A) of the
Federal Rules of Civil Procedure.

INITIAL DISCLOSURES

- (A) The names and if known, the addresses and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

See attached List of Individuals.

- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

See attached Document Index of Documents.

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

This party is not claiming damages.

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

NEOSU is self insured.

Respectfully submitted,

s/Susan E. Werner

Susan E. Werner, OBA #9482

Assistant Attorney General

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Attorney for Defendants Bridgmon,

Cowlshaw, Rugg, Shelburne, Shelton and

Turner

CERTIFICATE OF SERVICE

I hereby certify that on June 19th, 2014, I mailed the Defendant's Initial Disclosures along with a List of Individuals, Index of Documents and Documents to:

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Attorney for Plaintiff

s/Susan E. Werner

Susan E. Werner

LIST OF INDIVIDUALS

	Individuals	Subject Matter
1.	Northeastern State University c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
2.	Dr. Brian Cowlshaw c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
3.	Dr. Donna Shelton c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
4.	Dr. Audell Shelburne c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
5.	Dr. Phillip Bridgmon c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
6.	Dr. Steve Turner c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
7.	Dr. William Rugg c/o Susan Werner 313 NE 21 st Street, Oklahoma City, OK 73105 (405) 522-2930	Familiar with Plaintiff's employment at NEOSU.
8.	Martha Albin, HR at NEOSU	Familiar with Plaintiff's complaints.
9.	Janet Bahr, Interim Provost	Familiar with Plaintiff's complaints.
10.	Bridget Cowlshaw, NEOSU teacher c/o Dr. Brian Cowlshaw	Worked with Plaintiff.

INDEX OF DOCUMENTS

	Documents	Bates No.	Date Produced	Privilege
1.	Personnel File	001-011	6/19/2014	
2.	FB Posts - Documents	012-061	6/19/2014	
3.	Miscellaneous Documents re Plaintiff's Complaints	062-366	6/19/2014	Attorney-Client & Work Product Bates Nos. 074-076, 104, 111, 168-169, 181-186, 196-199, 302-304, 314, 332-337, 355-357